

Law Offices
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MD, DC, & VA

** criminal defense *debarment*
**security clearance cases and advice*
for individuals and companies

September 3, 2022

VIA ELECTRONIC MAIL

Terrance G. Reed
Lankford & Reed, P.L.L.C.
120 N. St. Asaph Street
Alexandria, VA 22314

Re: Lokhova v. Halper; 20-cv-1603; Discovery Production - Supplement

Dear Mr. Reed:

Enclosed with this letter is a supplement to the discovery production on behalf of the Plaintiff in this case in addition to what was produced earlier today. These documents are: (1) the exhibits to motions previously filed in this matter, which are, however, technically responsive to the Defendant's Discovery Requests even though you already have them, (2) five items that I reviewed, quoted, or used (images) in the Amended Complaint, which I could not find when I looked for them earlier today, but which I subsequently located, and (3) one additional email, which Ms. Lokhova forwarded to me. I have redacted the attorney-client privileged portion (the forwarding commentary) from the email. I'm not sure that this email is technically responsive to any of your requests, but it is an email that I would have included in a Rule 26(a) disclosure, so I'm including it now also. The documents are Bates numbered LOK0815 to LOK0927 and are attached. The bulk of the pages is the DOD OIG report about Mr. Halper's ONA contracts, so I don't think it, or anything else in this supplement will actually be of much interest for you in preparing for Ms. Lokhova's deposition.

I want to point out too, for clarity, that for some of your requests, I had expected that Plaintiff would have responsive documents and I would be receiving them from

LOK00815

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Ms. Lokhova, or others, or that we would obtain responsive documents to them in some other fashion, either before or perhaps even after the production deadline (on some issues) as the case progressed, thus I lodged my form objections to the requests and stated we would produce documents responsive to them.

The fact that I do not have such documents to produce now is a different issue from that. As an example, I have not produced any documents in response to your request No. 50 regarding Mr. Hemingway because I, in fact, do not have any such documents in my possession. However, I had expected that we would be obtaining some documents responsive to that request at a certain point, although I did not know exactly when that would be.

Sincerely,



Leslie McAdoo Gordon

Enclosures